

RUDLOFF WOOD & BARROWS LLP
ATTORNEYS AT LAW
2000 POWELL STREET, SUITE 900
EMERYVILLE, CALIFORNIA 94608
(510) 740-1500

G. EDWARD RUDLOFF, JR. (State Bar No. 56058)
EDWARD P. MURPHY (State Bar No. 182778)
ANNA A. CHOPOVA (State Bar No. 245730)
RUDLOFF WOOD & BARROWS LLP
2000 Powell Street, Suite 900
Emeryville, California 94608
Telephone: (510) 740-1500
Facsimile: (510) 740-1501
E-mail: erudloff@rwblaw.com
emurphy@rwblaw.com
achopova@rwblaw.com

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Attorneys for Defendant NATIONWIDE
MUTUAL FIRE INSURANCE COMPANY

E. GERARD MANNION (State Bar No. 77287)
DEMIAN I. OKSENENDLER (State Bar No. 233416)
MANNION & LOWE
655 Montgomery Street, Suite 1200
San Francisco, California 94111
Telephone: (415) 733-1050
Facsimile: (415) 434-4810
E-Mail: gmannion@sbcglobal.net
doksenendler@sbcglobal.net

Attorneys for Plaintiff
TAMIKO CARRILLO

UNITED STATES DISTRICT COURT OF CALIFORNIA
NORTHERN DISTRICT OF CALIFORNIA – SAN JOSE DIVISION

TAMIKO CARRILLO,

No. C 07-01979 JF

Plaintiff,

**STIPULATED REQUEST FOR
ORDER CHANGING TIME;
[PROPOSED] ORDER**
[Local Rule 6-2, 7-12]

vs.

NATIONWIDE MUTUAL FIRE
INSURANCE COMPANY, NATIONWIDE
MUTUAL INSURANCE, ALLIED
INSURANCE,

Amended Complaint
Filed: 07/25/07
Trial Date: None Set

Defendants.

[Hon. Jeremy Fogel]

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1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 Defendant Nationwide Mutual Fire Insurance Company ("Nationwide Fire"), by and
3 through its attorneys of record, Rudloff Wood and Barrows LLP, and Plaintiff Tamiko Carrillo
4 ("Plaintiff"), by and through her attorneys of record, Mannion & Lowe, hereby stipulate:

5 WHEREAS, this Court has not entered a Case Scheduling Order yet; and

6 WHEREAS, the parties' May 20th mediation session with Jack Williams from Williams &
7 Williams Mediation was cancelled by the mediator on May 13th on account of Mr. Williams's
8 health; and

9 WHEREAS, in response to the parties' Stipulated Request to Change Time, this Court's
10 June 18, 2008 Order provided for private mediation to be held by September 30, 2008; and

11 WHEREAS, the parties' dispute regarding the scope of discovery was not resolved until
12 this Court's July 9th Order Overruling Plaintiff's Objections to Order re: Defendants' Motion to
13 Compel and Plaintiff's Motion to Quash; and

14 WHEREAS, the parties have been meeting and conferring per Magistrate Judge
15 Trumbull's May 22d Order for purposes of determining the scope of discovery into Plaintiff's
16 medical records and into information related to the underlying proceedings; and

17 WHEREAS, the parties have been attempting to schedule the depositions of various
18 witnesses; and

19 WHEREAS, the parties agree that insufficient discovery has been conducted to make
20 mediation at this stage meaningful; and

21 WHEREAS, the parties agree to extend the time to complete private mediation, or another
22 form of ADR process, to January 31, 2009.

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1 THEREFORE THE PARTIES STIPULATE AS FOLLOWS:

2 1. The parties agree to extend the deadline for completion of ADR process to January
3 31, 2009.

4
5 DATED: September 3, 2008

RUDLOFF WOOD & BARROWS LLP

6
7 By: 

G. Edward Rudloff, Jr.
Edward P. Murphy
Anna A. Chopova

8
9 Attorneys for Defendant NATIONWIDE
10 MUTUAL FIRE INSURANCE COMPANY

11 DATED: September 3, 2008

MANNION & LOWE

12
13 By: 

E. Gerard Mannion
Demiah I. Oksenendler

14
15 Attorneys for Plaintiff TAMIKO CARRILLO

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[PROPOSED] ORDER

IT IS SO ORDERED, based on the Stipulation set forth above, and GOOD CAUSE

APPEARING, that:

1. The deadline for completion of ADR is extended to January 31, 2009.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 9/5/08



THE HONORABLE JEREMY FOGEL
United States District Court
Northern District of California

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